

Brandon S. Glosson, OSB # 080712
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630 Springtree Lane
West Linn, OR 97281
Telephone: (503) 653-1440
Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

CARLA REDDING,

Plaintiff,

vs.

LANE COMMUNITY COLLEGE,

Defendant.

Case No. 6:11-CV-06212-TC

AFFIDAVIT OF BRANDON S.
GLOSSON IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
TO EXTEND DISPOSITIVE MOTION,
DISCOVERY, EXPERT WITNESS
STATEMENT, PRETRIAL ORDER,
PRETRIAL DOCUMENTS, PRETRIAL
CONFERENCE, AND TRIAL DATES

I, Brandon S. Glosson, being first duly sworn, depose and say:

1. I am the attorney representing Plaintiff Carla Redding in the above-entitled matter. I make this Affidavit in support of Plaintiff's Unopposed Motion to Extend Dispositive Motion, Discovery, Expert Witness Statement, Pretrial Order, Pretrial Documents, Pretrial Conference, and Trial dates.

2. I have been dealing with some overwhelming personal issues which have interfered with my ability to continue to represent Plaintiff in this matter.

3. I do not expect these personal issues to resolve in the immediate future. More detail can be provided if the Court desires.

4. I notified Plaintiff via email on February 7, 2012, advising of my difficulties and suggesting that she retain another attorney to assist her in this matter. I agreed to provide her or her new attorney with a complete copy of my file and evidence in my possession. In response, Plaintiff asked that I file for a continuance of her case and withdraw as her lawyer.

5. Defendant is represented by Ms. Rebekah Jacobson. Ms. Jacobson has been consulted by myself and Mr. John F. Kilcullen. She has no objection to a 90-day extension of the current deadlines.

6. Ms. Redding is entitled to her day in court and to be represented by counsel. I am unable to provide that representation at this time and do not expect things to improve in the immediate future. A 90-day extension of deadlines is requested in order to allow Plaintiff enough time to retain a new lawyer to represent her in this matter. I am filing a motion to withdraw concurrent with this motion to extend deadlines.

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7. This motion is not made for the purpose of delay and is necessary in order to allow time for Plaintiff to obtain new counsel and for me to withdraw as her lawyer.

Dated this 5th of March, 2012.

/s/ Brandon S. Glosson

Brandon S. Glosson
(503) 653-1440
Attorney for Plaintiff Carla Redding

Subscribed and sworn to before me this 5th day of March, 2012.

/s/ Nyease M. Somersett

Notary Public for Oregon
My Commission Expires: May 13, 2015

CERTIFICATE OF SERVICE

I, hereby certify that I served the foregoing Affidavit of Brandon S. Glosson in Support of Unopposed Motion to Extend Dispositive Motion, Discovery, Expert Witness Statement, Pretrial Order, Pretrial Documents, Pretrial Conference, and Trial Dates upon the parties appearing below:

Carla Redding
891 23rd Street
Springfield, OR 97477
Telephone: (541) 653-9619
Email: defectiveweebil@gmail.com

Rebekah R. Jacobson
Garrett Hemann Robertson
1011 Commercial Street NE
P.O. Box 749
Salem, OR 97308
Telephone: (503) 581-1501
Email: rjacobson@ghrlawyers.com

By electronic means through the Court's Case Management/Electronic Case File System on the date set forth below.

Dated this 5th day of March, 2012.

/s/ Brandon S. Glosson

Brandon S. Glosson, OSB # 080712
(503) 653-1440
Attorney for Plaintiff